## **EXHIBIT B**

## EXHIBIT 47 UNREDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

## Case 5:14-cv-05344ABlam swoodleyent 5499AlyFiltenhtt9/26/hltGialPage 3 of 17 January 29, 2016

1	UNITED STATES DISTRICT COURT
2	NORTHERN DISTRICT OF CALIFORNIA
3	
4	CISCO SYSTEMS, INC.,
5	Plaintiff,
6	vs.
7	ARISTA NETWORKS, INC., Case No.
8	Defendant. 5:14-cv-5344-BLF
9	
10	
11	
12	HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
13	SUBJECT TO PROTECTIVE ORDER
14	
15	VIDEOTAPED DEPOSITION OF ADAM SWEENEY,
16	VOLUME I
17	
18	January 29, 2016
19	9:32 a.m 6:48 p.m.
20	
21	555 Twin Dolphin Drive, 5th Floor
22	Redwood Shores, California
23	REPORTED BY:
24	James Beasley
25	CSR No. 12807, CCR No. 835, RPR

```
1
        Α.
             I have not read all the standards, but I
   believe that to be true.
```

3

4

10

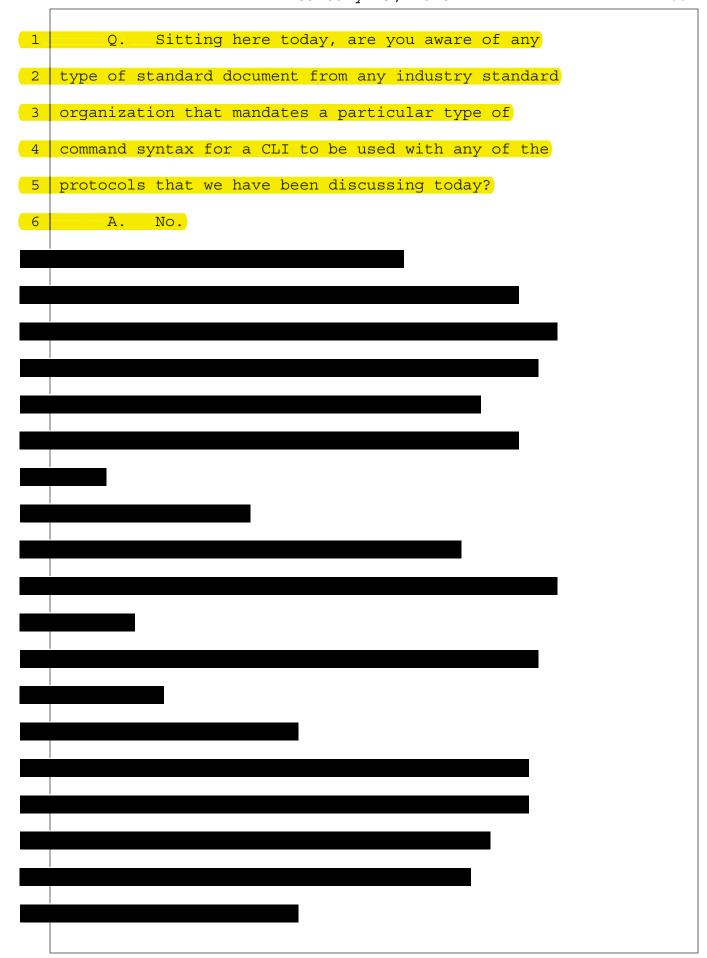
19

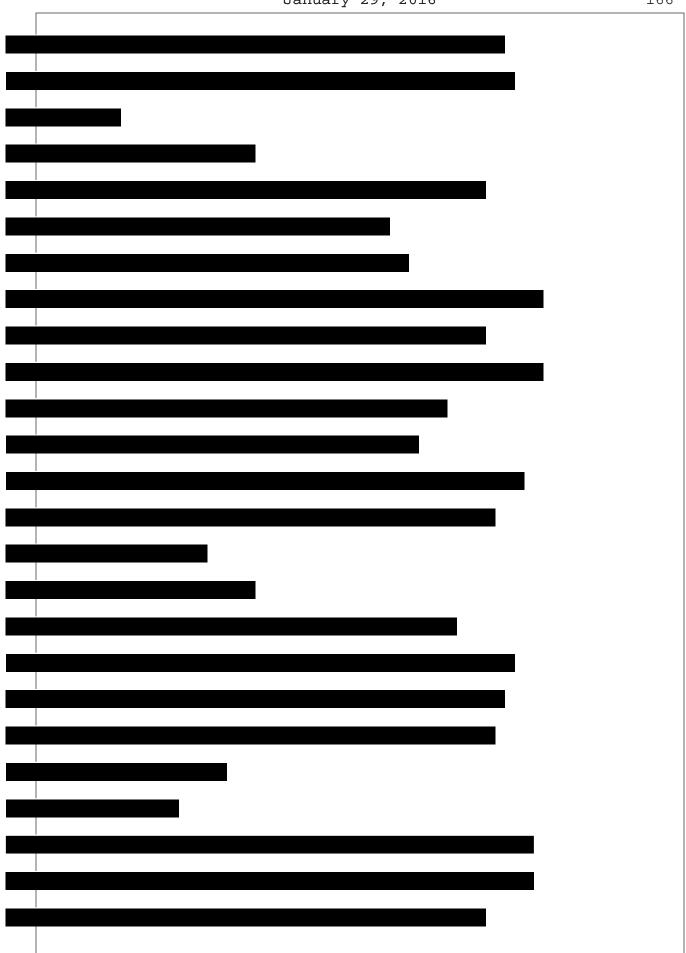
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21

22

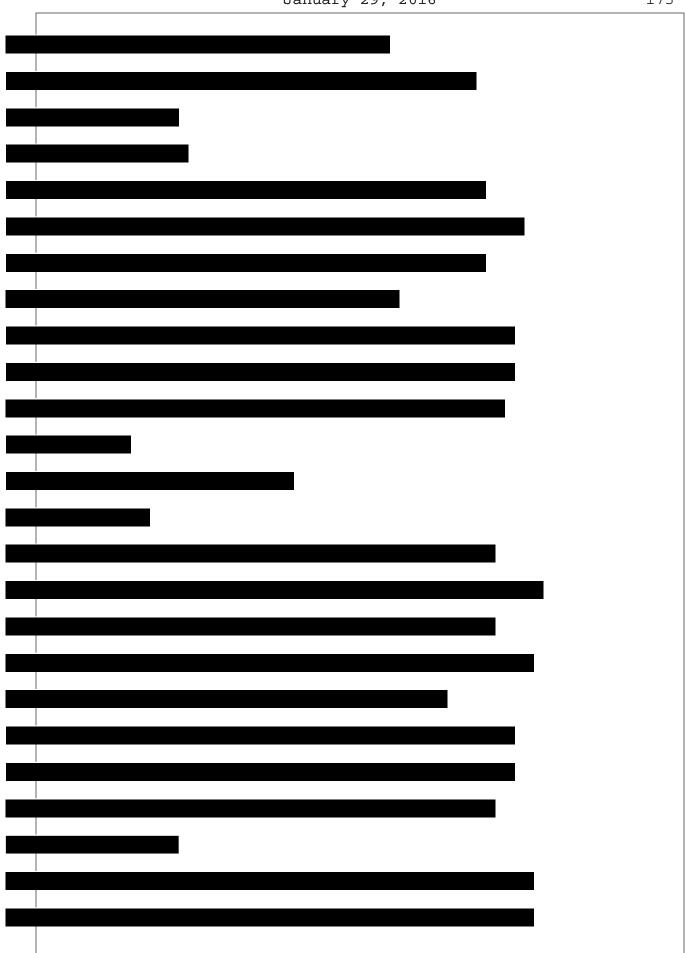
- And you're not aware of any single IETF document, sitting here today, that mandates a particular type of CLI command syntax for any of the protocols that we've been discussing, true?
- 7 The IETF has published thousands of documents over the years. I really couldn't say what might be in one of them somewhere.
- All I can ask you is about your knowledge. So I'm just saying, sitting here today, 11 are you aware of any single IETF document that 12
- mandates a particular type of CLI command syntax for 13 14 any of the protocols that we have been discussing today? 15
- In the tiny, little percentage of those 16 documents that I have read, I am unaware of any such 17 18 specification.
  - Sitting here today, are you aware of any IEEE documents that mandate a particular type of command syntax for any of the protocols that we have been discussing today?
- The IEEE does -- I don't believe they 23 Α. address any of the protocols we've -- we've been 24 25 talking about.

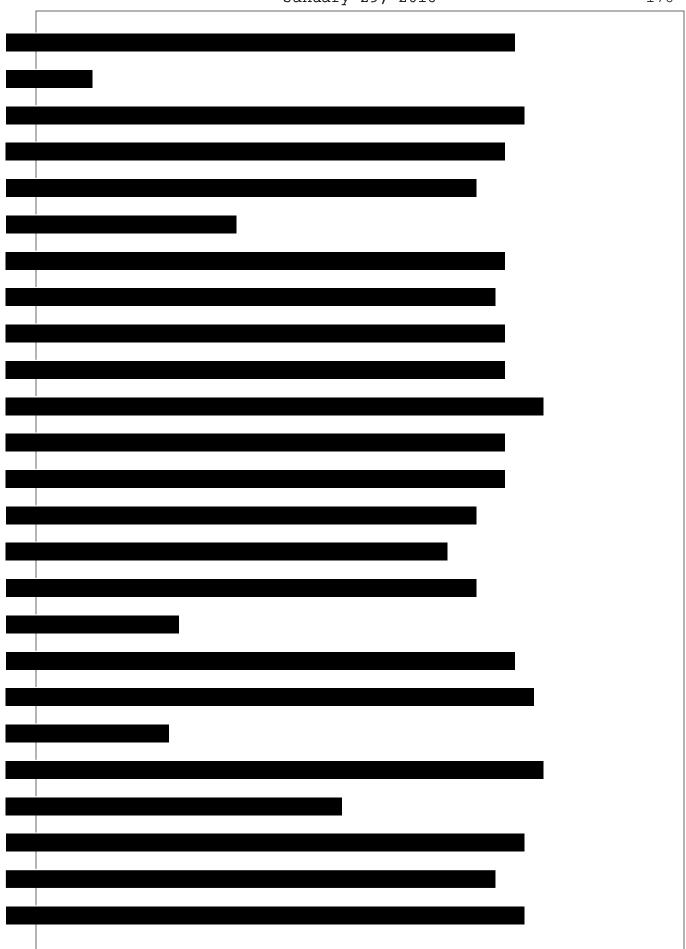






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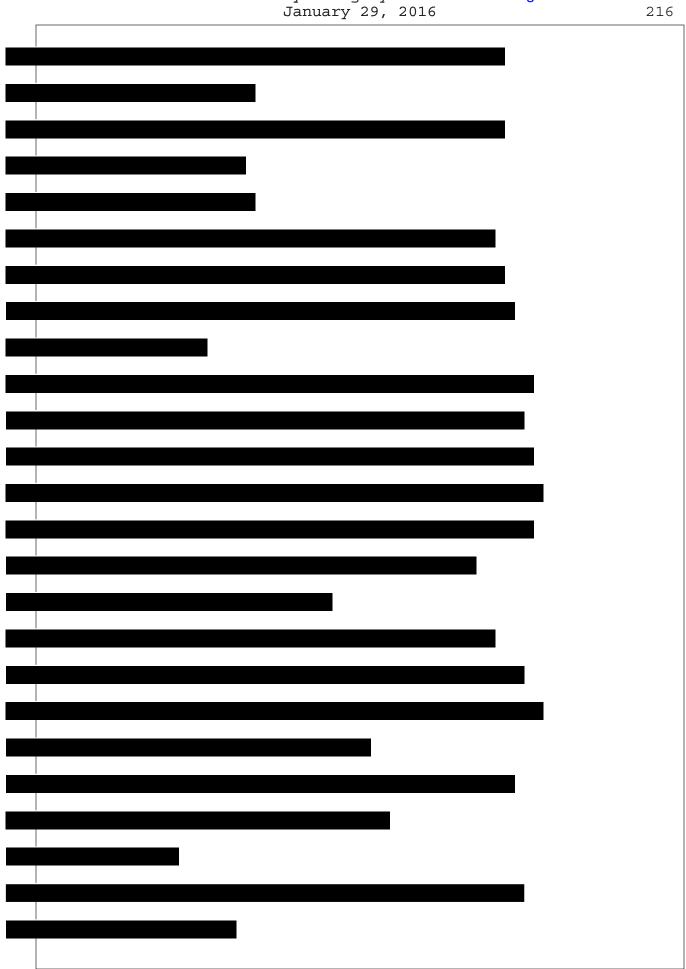


```
1
         Α.
              It states:
2
                  "Review in this list gives us a chance
3
              to work towards consistency within this
4
              very subjective space."
              And, again, you wrote those words?
5
         Ο.
              I think so.
         Α.
6
7
              And you believe that those are true
    statements?
         Α.
              Yes.
                    And when it says: "very subjective
10
              Okay.
    space," what is that referring to?
11
              I assume it means the space of CLI syntax.
12
         Α.
              And you say in the next sentence:
13
         Ο.
14
                 "In my opinion..."
              Can you read that.
15
         Α.
                 "In my opinion, syntax consistency with
16
              features that have similar function is
17
18
              very important."
              And what did you mean by that statement?
19
         Q.
              I meant that -- well, I -- I can only
20
    really tell you what I think it means now. I don't
21
2.2
    know what it meant at the time.
              All I can ask you is what you can glean
23
    from this, sitting here today.
24
25
              What is your understanding of that
```

```
1
    statement that you wrote in 2004?
 2
              I think it's pointing out that one of the
 3
    things that makes a set -- a -- a whole set of CLI
    commands functional is to keep -- keep their
 4
    structure consistent.
              Do you recall whether everybody at Cisco
 6
 7
    had that same belief?
              MR. FERRALL: Lacks foundation.
 8
    BY MR. PAK:
              To your knowledge?
10
         Ο.
              MR. FERRALL: Same objection.
11
12
              THE WITNESS: There's absolutely no way I
13
    can know what everyone in a 50,000-person company
14
    thinks.
    BY MR. PAK:
15
              And isn't it possible that others have --
16
    had expressed to you different opinions about how to
17
18
    name CLI syntax?
              Is it possible? I mean, it's possible
19
         Α.
    anyone said anything to me.
20
    Q. If somebody said to you, Mr. Sweeney,
21
22
    there's only one way, only one way to express a
23
    command syntax for a particular CLI command to be
24 used in a -- network equipment, would you agree with
25 | that statement?
```

```
1 A. No.
        Q. And why not?
   A. 'Cause it's not true.
     Q. And based on your experience, you know
   it's not true, true?
6
   A. Yes.
7
             And you're aware of -- even sitting here
    today, we've come across different operating
8
   systems, different implementations from different
   companies within the same company where different
10
   command line syntax was used for the same
11
12
    functionality, true?
             MR. FERRALL: Objection. Compound. Vaque
13
14
   and ambiguous.
15
             THE WITNESS: I quess I'm not sure if
   we've actually come across anything specific today
16
   on this front.
17
   BY MR. PAK:
18
19
        Q.
             You'd agree with me that different
   operating systems, different implementations from
20
   different companies, even different implementations
21
22
   within the same company can have different
23
   command-line interface syntax for the same
    functionality, true?
24
25
        A.
             I agree.
```

```
1
         Q.
              And, for example, we saw differences
   between -- you were aware of differences between
3
   NX-OS and IOS operating systems from Cisco with
   respect to certain CLI command syntax, true?
              I'm sorry, you kind of reversed your
   question in the middle there.
6
7
              You were -- you are aware of differences
   between NX-OS and IOS from Cisco with respect to
   certain CLI command syntax for the same
    functionality, true?
10
11
         Α.
              In general, yes.
              Okay. And generally speaking, you're also
12
         Ο.
    aware of certain differences between NextHop and
13
14
    Cisco IOS with respect to certain CLI command syntax
    for the same functionality, true?
15
         Α.
              Yes.
16
              Okay. And, sir, at your tenure at Cisco,
17
18
    did you come across any switching equipment where a
   graphical user interface was used rather than a
19
    command-line interface?
20
         Α.
              I don't think so.
21
2.2
              Are you aware of switching equipment that
   used a graphical user interface to configure and
23
   view system settings as opposed to a command-line
24
25
   interface?
```



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